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19 Ikea U.S. West, Inc., et al.

20 IN THE UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA

22 SUSAN HURTADO, individually and on behalf  
23 of all others similarly situated,

24 Plaintiffs,

25 v.

26 IKEA U.S. WEST, INC., a corporation, IKEA  
27 DISTRIBUTION SERVICES, INC. a corporation,  
28 IKEA NORTH AMERICA CAPITAL, INC., a  
corporation, IKEA PROPERTY, INC., a  
corporation, IKEA SUPPLY AG, a corporation,  
and DOES 1-250,

Defendants.

Case No.: C 11-3156 PJH

**STIPULATION AND ~~PROPOSED~~  
ORDER TO TRANSFER ACTION TO  
U.S. DISTRICT COURT, SOUTHERN  
DISTRICT OF CALIFORNIA**

Pursuant to Civil Local Rules 3-13, 7-11 and 7-12, counsel for Susan Hurtado in *Hurtado v. Ikea U.S. West, Inc., et al.*, Case No. C 11-3156-PJH, and counsel for defendant Ikea U.S. West, Inc., et al. ("Ikea") jointly submit the following Stipulation that the above-mentioned action be transferred to United States District Court for the Southern District of California.

WHEREAS, two putative class actions are pending against Ikea in the Southern District of California (*Medellin v. Ikea U.S. West, Inc.*, No. 3:11-CV-00921-WQH(BGS), filed February 14, 2011, and *Yeoman v. Ikea U.S. West., Inc.*, No. 3:11-CV-00701-WQH(BGS), filed March 2, 2011);

WHEREAS, each of the *Medellin* and *Yeoman* actions concerns substantially the same parties, transactions and events, and the potential for unduly burdensome duplication of labor and expense and conflicting results exists if the cases are in separate jurisdictions;

WHEREAS, the *Medellin* action is the lowest-numbered case;

WHEREAS, the plaintiffs in the *Medellin* and *Yeoman* actions are in the process of consolidating their complaints and have agreed to consolidate the *Hurtado* action once transferred to the Southern District;

THEREFORE, the parties hereby stipulate and agree:

The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH should be transferred to the Southern District of California.

Date: 11/21/2011

/s/ Hallie Von Rock

Hallie Von Rock  
Attorney for Plaintiff Susan Hurtado

Date: 11/21/2011

/s/ Kenneth Kawabata

Kenneth Kawabata  
Attorney for Defendant Ikea U.S. West, Inc.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED:

The action of *Hurtado v. Ikea U.S. West, Inc.*, Case No. C 11-3156-PJH, shall be transferred to the Southern District of California.

Date: 11/22/11

